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Special Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors. 1 : (Jointly Administered)

SUPPLEMENTAL DECLARATION OF JOHN J. NORMILE IN SUPPORT OF JONES DAY'S FIRST INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED DURING RETENTION PERIOD FROM SEPTEMBER 15, 2019 TO JANUARY 31, 2020

I, John J. Normile, hereby certify as follows:

1. I am a partner in the law firm of Jones Day. I submit this supplemental declaration to clarify certain statements made in *Jones Day's First Interim Application for Allowance of Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred*

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

During Retention Period from September 15, 2019 to January 31, 2020 (the "Application") filed on March 16, 2020 [ECF No. 948] and in further support thereof.²

- 2. As disclosed in paragraph 12 of the Application, the fees sought in the Application are in line with the budget discussed with and approved by the Debtors.
- 3. Given the limited scope of Jones Day's engagement, the inherent unpredictability of progress of litigation after a company files for bankruptcy and the real possibility in the Debtors' cases that the pending litigation Jones Day was handling for the Debtors would be stayed, the Debtors agreed that setting a specific hourly or monetary budget per open matter for the Compensation Period was not feasible.
- 4. Instead, Jones Day and the Debtors agreed to an estimated overall budget of \$1.5 million for the first 6 months from the Petition Date. The fees and expenses sought in the Application are in line with that overall budget.
- 5. Because the status of pending litigation is now more certain, and the Debtors and Jones Day have a better understanding of the scope of work involved in continuing Jones Day's further representation of the Debtors, Jones Day and the Debtors will agree on a more comprehensive budget for the subsequent compensation periods.

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² All capitalized terms used but not defined herein have the meanings given to them in the Application.

Dated: March 26, 2020

New York, New York

Respectfully submitted,

/s/ John J. Normile

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